

FILED

2017 MAY 31 AM 8:00

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
CIVIL RIGHTS DIVISION**

JOHN ANTHONY GENTRY, *sui juris/pro se*)
Plaintiff)
vs.)
THE STATE OF TENNESSEE;)
PAMELA ANDERSON TAYLOR;)
BRENTON HALL LANKFORD;)
SARAH RICHTER PERKY;)
UNNAMED LIABILITY INSURANCE)
CARRIER(S); Et al)
Defendants)

CASE NO. 3:17-0020

JURY TRIAL DEMANDED(12)

**PLAINTIFF'S RESPONSE TO "STATE OF TENNESSEE'S OPPOSITION TO
'MOTION TO ALTER MAY 15 ORDER DENYING LEAVE TO AMEND'"**

Plaintiff's Motion to Alter (Docket Entry No. 61) should be granted and Plaintiff should be allowed twenty-one (21) days to amend and file his Third Amended Complaint after granting of Plaintiff's Motion to Alter. **Defendant State of Tennessee has made false statements (Docket Entry 66)** that Plaintiff's Motion To Alter should be denied for failure to show errors of law, new evidence, or need to prevent justice which is untrue.

Plaintiff has shown two clear errors of law: (1) the Magistrate issued a ruling on a dispositive matter, exceeding the Magistrate's jurisdiction, (2) the Magistrate and District Court

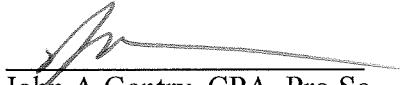
judges are in clear error in interpreting Fed. Rules of Civ. P. Rule 15(a)(1)(B) (See Docket Entry 64 p. 3 – 8).

Plaintiff has newly discovered evidence and facts that should and must be included in his Third Amended Complaint so as to ensure justice prevails (See Docket Entry 64 p. 8 and 10 – 18 and especially p. 19).

Plaintiff has demonstrated a need to prevent manifest injustice and harm to our entire country (See Docket Entry 64 p. 8 - 10 and 10 – 19).

Recognizing Plaintiff's right to amend not only corrects errors of law, rules of procedure and ensures justice, it promotes judicial efficacy (See Docket Entry 64 p. 20 - 21)

Respectfully submitted,



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CERTIFICATE OF SERVICE

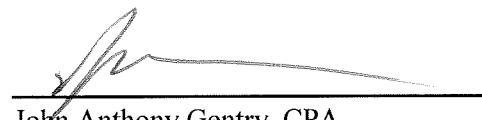
I hereby certify that a true and correct copy of the foregoing was sent via email and US Mail to;

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On this the 31st day of May, 2017



John Anthony Gentry, CPA